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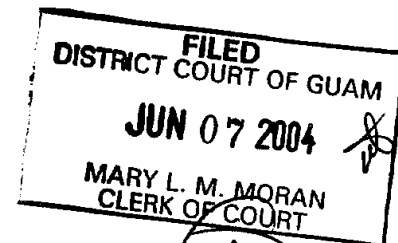
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Hagåtña, Guam 96932-5027

Tel No. 671.472.6813

Attorneys for Plaintiff

Hansen Helicopters, Inc.



IN THE DISTRICT COURT OF GUAM

HANSEN HELICOPTERS, INC.,

Plaintiff,

vs.

OCEAN AIR LOGISTICS, LORENZO
LOPEZ and AMERICAN NATIONAL
FIRE INSURANCE COMPANY,

Defendants.

CIVIL CASE NO. CIV02-00029

**APPLICATION FOR EXPEDITED
PRETRIAL CONFERENCE (FED. R.
CIV. P. 16) AND TRIAL DATE;
DECLARATION OF SERVICE**

Plaintiff Hansen Helicopters, Inc. (Hansen) respectfully applies for an expedited conference pursuant to Federal Rule of Civil Procedure 16. Rule 16 states that a

Court may in its discretion direct the attorneys for the parties and any unrepresented parties to appear before it for a conference or conference before trial for such purposes as

- (1) expediting the disposition of the action;
- (2) establishing early and continuing control so that the case will not be protracted because of lack of management;
- (3) discouraging wasteful pretrial activities;
- (4) improving the quality of the trial through more thorough preparation; and

(5) facilitating the settlement of the case.

Fed. R. Civ. P. 16(a). All of these reasons except (5) apply here.

A. Background

This case concerns an insurance policy Hansen purchased to insure a helicopter Hansen purchased in the U.S. Mainland. Defendant OceanAir arranged the ocean freight to ship the helicopter from the U.S. to Guam in a container, and also arranged for the in-transit insurance policy. When Hansen's employees opened the container, they found the helicopter in a damaged condition. Hansen then filed an insurance claim.

The insurance company denied the claim, yet eventually settled with Hansen in exchange for a dismissal from this action. However, during negotiations and exchange of documents with the insurance company, Hansen learned OceanAir had not obtained the "full coverage" policy Hansen asked for, and paid for. Instead, OceanAir instructed its broker to obtain a much cheaper policy which was riddled with exceptions and limitations to coverage. In particular, except for total loss of the helicopter caused by a catastrophic accident such as the ocean liner burning or sinking, the helicopter was all but uninsured. OceanAir then pocketed the approximately \$3,000 difference between the premium Hansen paid OceanAir and the premium OceanAir paid for the policy.

In addition to approximately \$35,000 in damages as compensation for uninsured repairs to the helicopters and punitive damages, Hansen seeks to recover the difference between the premium it paid for full coverage and the premium OceanAir paid for the limited coverage policy. Hansen also seeks damages for fraud.

The case is fully prepared for trial. The parties submitted trial briefs, trial exhibits and other pre-trial materials and were otherwise prepared for what would have been a one or two day trial. Unfortunately, at the last minute, the trial was taken off calendar. Since then, the

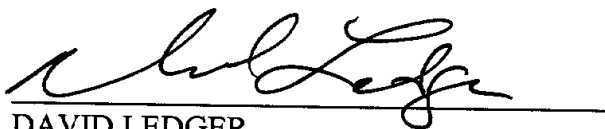
presiding judge has stepped down and the parties are unable to agree to assign the case to the Magistrate. In the circumstances, Hansen now requests an expedited pre-trial conference and trial setting.

B. Conclusion

Based on the foregoing and Rule 16, Hansen Helicopters, Inc. respectfully requests an expedited conference with the Court. By granting the requested Rule 16 Conference, the parties may be informed of the status of proceedings pending before the Court and obtain a new trial date.

DATED: Hagåtña, Guam, June 7, 2004.

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A handwritten signature in black ink, appearing to read "David Ledger", is written over a horizontal line.

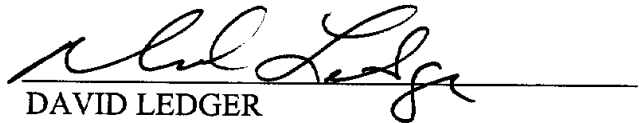
DAVID LEDGER
Attorneys for Plaintiff
Hansen Helicopters, Inc.

DECLARATION OF SERVICE

I, David Ledger, hereby declare, under the penalty of perjury of the laws of the United States, that on the 7th day of June 2004, I caused to be served, via hand delivery, a true and correct copy of the foregoing **APPLICATION FOR EXPEDITED PRETRIAL CONFERENCE (FED. R. CIV. P. 16); DECLARATION OF SERVICE** upon:

Steven A. Zamsky, Esq.
Zamsky Law Firm
Suite 805, GCIC Building
414 West Soledad Avenue
Hagåtña, Guam 96910

Executed this 7th day of June 2004 at Hagåtña, Guam.


DAVID LEDGER